

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

DAVITA M. KEY,

Plaintiff,

v.

**HYUNDAI MOTOR MANUFACTURING
ALABAMA, LLC, HYUNDAI
ENGINEERING AMERICA, INC. and
DYNAMIC SECURITY, INC.**

Defendants.

**CIVIL ACTION NUMBER:
2:19-cv-00767-ECM-SMD**

**DEFENDANT HYUNDAI MOTOR MANUFACTURING ALABAMA, LLC'S
DESIGNATION OF DEPOSITION/TRIAL EXCERPTS**

Defendant, Hyundai Motor Manufacturing Alabama, LLC, designates the following deposition excerpts which may be offered as evidence at trial:

1. Deposition excerpts of Davita M. Key dated June 20, 2022, pursuant to Rule 32(a)(1) and (3) F.R.C.P. and Section 10 of the Court's Order (Doc. 57): 1:5-25, 4:1-5:25, 10:19-11:19, 243:7-9, 85:11-86:8, 115:1-9, 277:21-25, 19:10-24, 23:16-26:7, 40:18-41:8, 21:8-22:7, 18:15-24, 31:3-23, 36:1-38:5, 31:20-23, 32:25-33:17, 27:10-21, 28:1-4, 44:10-12, 17:21-18:1, 127:1-25, 128:19-129:16, 135:2-20, 115:18-116:14, 117:14-25, 116:15-117:5, 140:16-141:8, 141:25-143:4, 23:10-13, 35:24-25, 138:13-139:23, 141:9-12, 144:4-146:4, 51:6-13, 118:13-21, 147:20-148:6, 150:5-151:1, 119:8-120:2, 151:25-154:6, 120:13-122:3, 159:11-160:23, 63:24-65:1, 78:9-79:7, 67:8-10, 162:4-12, 164:17-23, 35:22-23, 165:8-20, 166:14-17, 167:8-13, 168:11-14, 168:15-24, 41:24-43:3, 174:11-22, 226:16-227:3, 125:13-126:6, 226:16-227:6, 29:8-18, 48:16-23, 52:11-53:22, 135:2-20, 21:24-22:7, 47:10-22, 58:16-18, 29:20-25, 47:10-22, 62:5-

17, 75:1-76:2, 48:24-53:22, 56:16-57:3, 76:15-77:11, 62:2-17, 69:11-70:12, 70:13-19, 184:11-185:3, 270:21-271:3, 39:18-40:17, and any excerpt which may be needed for impeachment.

Respectfully Submitted,

s/ David J. Middlebrooks
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CERTIFICATE OF SERVICE

I hereby certify that on January 26, 2023, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

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